

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In the Matter of:

**ERIC MATHIS  
CODY MATHIS,**

Debtor(s).

In Bankruptcy:

Case No. 19-45744-mlo  
Chapter 7  
Hon. Maria L. Oxholm

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**TRUSTEE'S RESPONSE TO  
MOTION TO LIFT STAY**

Timothy J. Miller, by and through his attorneys, Clayson, Schneider and Miller, P.C., states as follows his Response to Motion to Lift Stay filed by creditor U.S. Bank National Association (*Docket No. 10*):

1. Admitted.
2. Admitted that U.S. Bank National Association is the noteholder. Denied as to entitlement to foreclosure due to bankruptcy proceedings.
3. Admitted.
4. Admitted.
5. Paragraph 5 is a summary of a Bankruptcy Code provision for which no response is required.
6. Neither agree nor deny.

7. Neither agree nor deny.
8. Neither agree nor deny.
9. Admitted, as to the value that is stated in the schedules. But the estate has not had an opportunity to evaluate.
10. Denied. Movant is adequately protected and the Trustee should be allowed opportunity to market the property for the benefit of the estate.
11. Denied. Estate has potential interest in the property.
12. Paragraph 12 consists of a request for relief for which no response is required. Nevertheless, the Trustee objects to the relief requested therein.
13. Paragraph 13 consists of a request for relief for which no response is required. Nevertheless, the Trustee objects to the relief requested therein.
14. Denied. No concurrence was requested from the estate.

**WHEREFORE**, Timothy J. Miller, Trustee, prays for entry of an order denying the Motion of U.S. Bank National Association for relief from the automatic stay.

*[signature on next page]*

Respectfully submitted,

**CLAYSON, SCHNEIDER & MILLER P.C.**

Dated: May 24, 2019

/s/ Peter F. Schneider, attorney

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